

# Exhibit 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

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CHMURA ECONOMICS & ANALYTICS, LLC  
Plaintiff

vs.

Case No. 3:19-CV-00813

RICHARD LOMBARDO  
Defendants

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REMOTE VIDEO DEPOSITION OF:  
CHRISTINE CHMURA, PH.D.

Taken on:  
May 1, 2020  
11:00 a.m.

Taken at:  
  
McGuire Woods, LLP  
Gateway Plaza  
800 East Canal Street  
Richmond, VA

Kelliann D. Linberg, RPR, Notary Public

1           Q.     Okay. So what occurred after you talked to  
2     -- after you had your conversation with counsel, what  
3     occurred next?

4           A.     I believe the letter went out to Rick  
5     requesting that he send back the information. I  
6     believe we offered him maybe 10,000 as a severance.

7           Q.     At that point, was Mr. Lombardo on unpaid  
8     leave?

9           A.     He was not -- I don't remember if it was  
10    unpaid or not, but he certainly wasn't working. But he  
11    was still -- he had not been fired yet.

12          Q.     Why did Chmura decide to terminate  
13    Mr. Lombardo's employment?

14          A.     Well, certainly, we saw from the pattern of  
15    his work relationship with us, that, one, greater  
16    distrust was occurring over time. But when you get to  
17    the point that someone says, "I am going to take your  
18    book of business and sell it to the competition, I am  
19    going to put you out of business, I am going to screw  
20    you," I think any reasonable minded person would fire  
21    someone at that point.

22          Q.     In the days leading up to those reported  
23    statements, what had occurred?

24          A.     Can you be more --

25                 MR. SATTERWHITE: Object to the form.